

FILED

JUL 18 2022

General Complaint

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

Baker, Harvey Watkins, Pro Se Litigant

Case Number : 4:22cv609-SDJ-CAN

List the full name of each plaintiff in this action.

VS.

Capital One Auto Finance
Corporation Service Company, Registered
Agent

List the full name of each defendant in this action.

Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

1. Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

N/A, Pro Se Litigant

C. Results of the conference with counsel:

N/A

II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? Yes ☒ No

B. If your answer to "A" is "yes", describe the lawsuit in the space below. If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: N/A

2. Parties to previous lawsuit(s):

Plaintiff N/A

Defendant N/A

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

N/A

4. Docket number in other court. N/A

5. Name of judge to whom the case was assigned.

N/A

6. Disposition: Was the case dismissed, appealed or still pending?

N/A

7. Approximate date of disposition. N/A

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 Harvey Watkins: Booker III
Mailing address 3436 Magazine Street Suite 531
New Orleans, Louisiana 70115

Pla #2 _____

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1: Capital One Auto Finance, Corporation
7933 Preston Road Plano, Texas 75024

Subbu Rajasimhan, corporation representative

Dft #2: Corporation Service Company,
211 E. 7th Street Suite 1020, Austin Texas 78701
Registered Agent

Dft #3 _____

Attach a separate sheet for additional parties.

IV: Statement of Claim:

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

Corperation Service Company is the Registered Agent listed for Capital One Auto Finance, Inc.

I had reason to believe I was taken advantage of by way of the Retail Sales Installment Agreement. I sent certified notices of the highlighted violations in addition to affidavits to request more information on the Finance Charge, Downpayment, Material disclosures as is listed under the Consumer credit Protection Act.

Capital One Auto Finance has failed to respond to numerous notices, the latest, which is attached to this complaint. Due to Capital One's failure to respond to my certified affidavits, I am moving for a default judgment as a result. The certified receipts sent to the company is also attached to this notice.

- V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

I am seeking a default judgment per the
Federal Rules of Civil Procedure by the clerk
due to Capital One Auto Finance's failure to
respond to my certified notices.

Signed this fourteenth day of Seventh, 20 22.
(Month) (Year)

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: 7/14/2022
Date

Harvey Nathaniel Prokitt

Signature of each plaintiff